ENCLOSURE NOT INCLUDED

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

30 SEP 1985

OVERNIGHT DELIVERY

William R. Tobin, P.E.
McBride-Ratcliff and Associates, Inc.
7220 Langtry
Houston, Texas 77040

Dear Mr. Tobin:

Per our meeting at your office on September 12, 1985 I wanted to document some of the issues that were discussed relative to the South Cavalcade site Remedial Investigation.

1) Chain of communication between McBride-Ratcliff (MBR) and Camp, Dresser and McKee (CDM) relative to compliance monitoring - First, the purpose of the compliance monitoring program is to provide the EPA with "eyes and ears", CDM is not tasked to direct the investigation. Second, if during the investigation, the CDM compliance monitoring person observes a "problem" the CDM person should discuss the problem with the MBR representative. If the problem is not resolvable, the CDM person is to pass the issue on to the CDM office and the EPA.

2) Specific locations for surface water sampling - MBR will attempt to coordinate the sampling locations with the EPA. If coordination with the EPA is not possible after reasonable efforts, MBR will concur with the CDM compliance monitoring person.

3) Power auger investigation program - The goal of the power auger investigation program is to allow visual observation and qualitative analysis of a large number of areas on the site. This goal is achieved by the use of the (inexpensive) shallow, solid stem auger sampling method and by not tieing the sampling efforts to (expensive) GC/MS analyses. The power auger investigation program will: (1) allow the limits of surficial contamination to be determined accurately, (2) allow the determination of the best location for the full scale hollow stem auger borings and (3) help eliminate the sampling bias created by reviewing the 1"=300' historical photos. Although it is regrettable that a large percentage of the borings must be drilled through concrete, the EPA intends to enforce the requirement of a power auger sampling program.

4) Subsurface sampling in areas occupied by warehouses - At this time, the EPA believes that sampling around the perimeter of the warehouses will be adequate.

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5) X-ray fluoresence or equvalent - MBR is welcome to substitute Atomic Absorption for x-ray fluoresence. The EPA would prefer that MBR maintain about 1 day turn around and that MBR also follow EPA methodologies.

6) Total petroleum hydrocarbon content or equivalent - MBR is welcome to use UV fluorescense as the surrogate analysis for creosote and possibly pentachlorophenol. EPA encourages spending as much time as possible uptront developing the methodology since 100's of surrogate samples will be analyzed.

7) Head Space Analysis - EPA prefers a water bath temperature control and a 4 hour waiting period as proposed in Koppers' Sampling and Analytical Plan. If this causes serious logistical problems, MBR can transport the samples to their office for overnight storage prior to head space analysis.

8) Use of previously generated data - EPA Office of Quality Assurance has indicated that MBR can apply existing data from CDM's "Cavalcade Contaminant Survey" towards fulfilling the requirements of the EPA RI/FS Work Plan provided that the data meets the "PRP Data Requirements". A copy of this document is enclosed for your reference. The only exception is that MBR can not apply data from the previous groundwater analysis.

9) Conflict of interest associated with Southern Petroleum Lab - Based on information ascertained by the EPA, Southern Petroleum Labs has never been employed by any of the Potentially Responsible Parties at this site. Therefore, it appears that there is no conflict of interest for MBR to employ the services of Southern Petroleum Labs.

10) Subsurface sampling methodology - MBR's suggestion of using wet rotary techniques to collect subsurface samples and install the monitoring wells has been reviewed by the EPA. The EPA can not allow the use of wet rotary at the South Cavalcade site. Wet rotary is suitable for geotechnical work but has several deficiencies relative to hazardous waste investigations. First, most drilling fluids have a high ion exchange capacity that may affect the metal content of groundwater near the well. Second, organic drilling fluids can affect the organic content of groundwater near the well. Third, circulating fluids can carry contaminants from the near surface to below the water table. If, after numerous field borings, the use of dry hollow stem augering technique does not appear practical, modifications, such as "single pass" mud circulation or maintaining a water head inside the hollow stem may be tried with prior EPA approval.

I would also like to remind you that all non-analyzed samples must be properly archived, per page 4-18 of the RI/FS Work Plans. Should you have any questions, I can be reached at (214) 767-9763.

Sincerely yours,

John Cochran
Regional Site Project Officer

Enclosure

cc: M. Tymiak, Koppers
B. Kier, CDM